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**Attorneys for Defendants**  
**Steelman & McAdams and**  
**Annie McAdams, Esq.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DEBBIE GORE, on behalf of herself  
and all other similarly situated,

Plaintiffs,

v.

BRUCE H. NAGEL; ANDREW L.  
O'CONNOR; ROBERT SOLOMON;  
NAGEL RICE, LLP; DEREK POTTS;  
POTTS LAW FIRM, L.L.P.; BAILEY  
PEAVEY BAILEY COWAN  
HECKAMAN, PLLC; BAILEY  
PEAVEY BAILEY; BAILEY PERRIN  
BAILEY; MESH LITIGATION  
CENTER; ANNIE MCADAMS;  
STEELMAN MCADAMS; JUNELL &  
ASSOCIATES, PLLC; K. CAMP  
BAILEY, PC; and BURNETT LAW  
FIRM,

Defendants.

Civil Action No. 2:19-cv-14287-MCA-LDW

Hon. Madeline Cox Arleo, U.S.D.J.

Hon. Leda Dunn Wettre, U.S.M.J.

**CERTIFICATION OF  
MARK M. TALLMADGE IN  
SUPPORT OF MOTION TO  
DISMISS THE FIRST AMENDED  
CLASS ACTION COMPLAINT**

I, Mark M. Tallmadge, hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey and I am admitted to practice in the United States District Court for the District of New Jersey.

2. I am a shareholder of the law firm of Bressler, Amery & Ross, P.C., attorneys for defendants Steelman & McAdams and Annie McAdams, Esq. (collectively the “McAdams Defendants”) in the above-captioned matter. As such, I have personal knowledge of the facts set forth herein.

3. I submit this Certification in support of the McAdams Defendants’ motion to dismiss the First Amended Class Action Complaint.

4. On July 17, 2019, the McAdams Defendants filed a motion to dismiss the Verified Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and (6). Specifically, the McAdams Defendants asserted that this Court lacks in personam jurisdiction over them and, therefore, could not reach the merits of the claims asserted against them. In support of their motion, the McAdams Defendants submitted the Declaration of Annie McAdams, Esq. (Dkt. 18-2) and a Brief (Dkt. 18-1).

5. On August 2, 2019, plaintiffs filed a First Amended Class Action Complaint (Dkt. 30). This amended pleading added an additional plaintiff to the purported class action but included no new allegations against the McAdams Defendants. Accordingly, the McAdams Defendants repeat their argument that

this Court lacks in personam jurisdiction over them. Further, the McAdams Defendants incorporate by reference the Declaration of Annie McAdams, Esq. (Dkt. 18-2) and Brief (Dkt. 18-1) previously filed with the Court in support of their motion to dismiss the First Amended Class Action Complaint.

6. For all of the reasons set forth in the Brief and in the Declaration of Annie McAdams, Esq., it is respectfully submitted that no basis exists for this Court to exercise in personam jurisdiction over the McAdams Defendants. Therefore, the instant motion to dismiss must be granted and the First Amended Class Action Complaint dismissed as to the McAdams Defendants.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

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/s/Mark M. Tallmadge  
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Mark M. Tallmadge

DATED: August 30, 2019